

1 Malani Dale Kotchka-Alanes
2 Nevada Bar No. 13168
3 E-Mail: mkotchkaalanes@lrrc.com
4 **Lewis Roca Rothgerber Christie LLP**
5 3993 Howard Hughes Parkway, Suite 600
6 Las Vegas, Nevada 89169-5996
7 Tel: (702) 949-8258
8 Fax: (702) 949-8398

9 *Attorney for Plaintiff Charon L. Brown*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CHARON L. BROWN,

13 Plaintiff,

14 vs.

15 OFFICER MECHAM, et al.,

16 Defendants.

CASE NO.: 2:15-CV-01670-APG-NJK

**STIPULATION TO EXTEND RULE 60
MOTION DEADLINE (FIRST REQUEST)**

17 Former Defendant NaphCare, Inc., and Plaintiff Charon Brown stipulate as follows:

- 18 1. Whereas the Court granted NaphCare, Inc.'s original motion to dismiss on June 1, 2016
19 (ECF No. 22 (Order Granting ECF No. 12));
- 20 2. Whereas Malani Dale Kotchka-Alanes was appointed as pro bono counsel for Plaintiff
21 Charon Brown on March 28, 2017;
- 22 3. Whereas Plaintiff issued a subpoena for NaphCare, Inc. to testify at a deposition scheduled
23 for May 30, 2017;
- 24 4. Whereas Plaintiff and NaphCare, Inc. have agreed to reschedule the deposition to
25 accommodate the parties' and counsels' schedules;

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1 5. Therefore, the parties agree to extend the Rule 60 motion deadline to July 13, 2017.

2 Dated this 31st day of May, 2017.

3 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

4 By: /s/ Malani Dale Kotchka-Alanes

5 MALANI DALE KOTCHKA-ALANES

6 Nevada Bar No. 13168

3993 Howard Hughes Pkwy., Suite 600

Las Vegas, NV 89169-5996

7 *Attorney for Plaintiff Charon L. Brown*

8 **ALVERSON, TAYLOR, MORTENSEN &**
9 **SANDERS**

10 By: /s/ Michael T. McLoughlin

11 MICHAEL T. MCLOUGHLIN

12 Nevada Bar No. 012820

SHIRLEY BLAZICH

13 Nevada Bar No. 008378

14 7401 W. Charleston Blvd.

Las Vegas, NV 891117

15 *Attorney for Defendant NaphCare, Inc.*

16 **IT IS SO ORDERED:**

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18 
19 UNITED STATES MAGISTRATE JUDGE

20 Dated: June 1, 2017